

Phase 2e: Transitioning from LTID Account Phase to Full CAIS Phase

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1. Revisions Summary

Version	Publish Date	Description
1.0	10/19/2021	Initial publication.
1.1	02/03/2022	Conformed the dates throughout to be consistent with Table 1. Corrected minor typos. Updated Table 2.
1.2	02/22/2022	Removed the requirement that FDID records submitted in the LTID phase be ENDED in CAIS if they will not be migrated to Full CAIS. Corrected minor typos.
1.3	04/04/2022	Removed the statement that the CAIS Report Card for Industry Members will contain the count of FDIDs remaining as LTID Account Phase records since this will no longer be included for compliance counts.
1.4	09/07/2022	Updated Section 3 to include reference to the exemptive relief requests. Updated the document to conform with the revised Full CAIS Compliance Go-Live date and interim reporting deadlines as set forth in CAT Alert 2022-01. Updated the cutover dates in Table 1 and throughout. Removed Table 2 from this document and included a hyperlink to the Full CAIS Industry Member Release Rollout document. Updated Tables 3 and 4 to conform with v9.1 of the Full CAIS Technical Specifications. Corrected typos.
1.5	10/28/2022	Updated the cutover dates in Table 1 and throughout. Added references to CAT Alert 2022-01 in Sections 5 and 5.1. Clarified in Section 5.1 that rejections for Active Accounts must be repaired by December 5, 2022. Corrected typos.
1.6	11/29/2022	Updated the deadline for Interim Reporting Obligation 4 and the Full CAIS Compliance Go-Live date throughout. Added reference to the November 22, 2022 exemptive relief request to footnote 1.

1.7	08/08/2023	Updated the deadline for Interim Reporting Obligation 4 and the Full CAIS Compliance Go-Live date throughout Updated Footnote 1 Updated Section 5 to note that the FDID Version Report will be retired Updated Section 7 to include reference to other published guidance Corrected minor typos
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2. Summary

This CAT Alert describes how Industry Members must transition from the LTID Account Phase of CAIS reporting to Full CAIS (Phase 2e) of CAIS reporting for data and Transformed Identifier (TID) submissions.

3. Test Environment Plan Overview

The CAT CAIS Industry Test Environment (“Test Environment”), CAT CAIS Production Mirror Environment (“Prod Mirror Environment”) and CAT CAIS Production Environment are used in concert to facilitate efficient testing for Industry Members and CAT Reporting Agents. As such, effective January 31, 2022, the Test Environment is available for testing of Phase 2e data. Full CAIS Phase metadata and data files submitted to the Test Environment must be formatted per the schema definitions and requirements for Phase 2e (schema version 2.0.0).

LTID Phase format (schema version 1.0.0) submissions will continue to be accepted in the Test Environment until October 30, 2022, and in the Prod Mirror Environment, and Production Environment until November 5, 2022. Any data submitted to the Test Environment in LTID Phase format will be accepted into the system, however it will not be accepted for Full CAIS Phase certification purposes. With the proposed extension of the CAIS Reporting Deadline to May 31, 2024¹, the compliance date for reporting of Customer Information that is Phase 2e Industry Member Data would be moved to May 31, 2024, and, accordingly, the Customer Information Reporting Timeframes applicable to the Central Repository would not apply to such data until May 31, 2024, if the relief is granted. However, once an LTID has been accepted in the Phase 2e format (schema version 2.0.0), such LTIDs can no longer be reported in the LTID Phase format (schema version 1.0.0). If the CAIS Exemptive Relief Request is granted, LTIDs that have been reported in the Phase 2e format (schema version 2.0.0) would not be subject to all Customer Information Reporting Timeframes until May 31, 2024. Accordingly, the

¹ On May 22, 2023, the Plan Participants filed an exemptive relief request with the SEC to extend the deadline for Full Implementation of CAT NMS Plan Requirements, which includes Full CAIS Compliance. See CAT Alert 2023-01 regarding the new Interim Reporting Obligation 4 and Full CAIS Compliance Go-Live dates.

Participants have requested temporary exemptive relief² until May 31, 2024 from certain reporting and processing requirements related to LTIDs under the CAT NMS Plan and the Phased Reporting Exemption.

Table 1: Summary of Acceptable Schema in Each Environment

	8 am ET on January 30, 2022 – April 23, 2022	8 am ET on April 24, 2022 – October 29, 2022	8 am ET on October 30, 2022 – November 5, 2022	8 am ET on November 6, 2022 and beyond
Environment	Acceptable Schema(s)	Acceptable Schema(s)	Acceptable Schema(s)	Acceptable Schema
Industry Test Environment	Full CAIS Phase and LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase	Full CAIS Phase
Prod-Mirror Environment	LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase
Production Environment	LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase and LTID Account Phase	Full CAIS Phase

Reporting Relationships must be established in each separate environment. Any Reporting Relationships established in an environment for the LTID Account Phase is retained for the Full CAIS Phase. Only user accounts with the CAIS LTID Production entitlement will have access to the Production Environment, however it will not be possible to submit Full CAIS Phase files in the Production Environment until the Industry Member has been certified for the Full CAIS Phase.

The functionality available in the Test, Prod Mirror, and Production Environments for Phase 2e will be rolled out as detailed in the [Full CAIS Industry Member Release Rollout](#).

As a reminder, the Prod Mirror Environment will also have deployments at the same time as the Production Environment deployments.

² On August 10, 2022, the Participants submitted to the SEC a [request](#) for temporary exemptive relief from certain reporting and processing requirements in the CAT NMS Plan related to large trader identifiers (LTIDs).

4. Full CAIS Phase Certification

Industry Members and CAT Reporting Agents are required to perform testing to demonstrate their ability to successfully submit data to Full CAIS prior to accessing the Full CAIS Production Environment. Testing is performed in the CAIS Industry Test Environment, utilizing the Full CAIS Phase file and record schemas, including file and attribute validations. CAT Reporters have no volume limitation and may submit full production-equivalent loads to the Industry Test Environment. Submission and feedback processes mirror those of the Production Environment. Testing certification must be completed prior to submitting full customer and account data to the Full CAIS Production Environment.

The Full CAIS Production readiness certification requirements differ for Self-Reporting Firms, Clearing Firms and CAT Reporting Agents, Industry Members submitting only via CAT Reporting Agents, and firms that do not have Production FDIDs. Please see the [CAIS Onboarding Guide](#) for complete certification requirements.

5. Production Environment Phased Plan Overview

To facilitate the reporting of Full CAIS Phase records, the ability to report Full CAIS Phase submissions to the Production Environment will begin at approximately 8 am ET on April 24, 2022, via a code deployment. Prior to code deployment, all submissions to the Production Environment must be in LTID Phase format. During the Transition Period between April 24, 2022 and November 5, 2022, both the LTID Account Phase and the Full CAIS Phase schemas will be accepted in the Production Environment, however, per Interim Reporting Obligation 2, it is expected that all Active Accounts will be submitted to the Production Environment in Full CAIS Phase format no later than October 31, 2022. Please see [CAT Alert 2022-01](#) for more information on the interim reporting obligations, including Interim Reporting Obligation 2. **Once a Firm Designated Identifier (FDID) Record has been accepted into CAT CAIS in a Full CAIS Phase (v2.0.0) submission, attempting to submit the FDID again in an LTID Account Phase (v1.0.0) submission will result in a rejection of the record.**

A full set of Customer Account Information and Customer Identifying Information for all Active Accounts³ reported in the LTID Account Phase (v1.0.0) submission must be reported and accepted in a Full CAIS Phase (v2.0.0) submission on or before October 31, 2022. Please see [CAT Alert 2022-01](#) for more information on the interim reporting obligations, including Interim Reporting Obligation 2. Industry Members are not required to submit to Full CAIS a full set of Customer Account Information and

³ Section 1.1 of the CAT NMS Plan defines “Active Accounts” as “an account that has had activity in Eligible Securities within the last six months.” All accounts with any CAT-reportable activity on or after June 12, 2022 must be reported to CAIS with the implementation of Phase 2e (Full CAIS). See FAQ [Q40](#) for more information.

Customer Identifying Information for any inactive FDIDs reported in the LTID Account Phase (v1.0.0). An FDID Version Report, containing the list of FDIDs received in an LTID Account Phase submission and not yet accepted in a Full CAIS Phase submission or ended in CAIS, will be made available within the CAT CAIS Reporter Portal and via SFTP in June of 2022. It is expected that the FDID Version Report may contain FDIDs submitted in the LTID Account Phase that are not considered Active Accounts and not required to be submitted to Full CAIS. Industry Members may, but are not required to, remove these FDIDs from the FDID Version Report by ending the inactive FDIDs in the LTID Account Phase (schema v1.0.0) with an *fdidEndReason* of 'ENDED' or submit them to Full CAIS (schema v2.0.0). The FDID Version Report is a tool designed to assist Industry Members during the transition period between LTID Account Phase reporting and Full CAIS Phase reporting and, as such, will be retired after the transition period.

Starting at approximately 8 am ET on November 6, 2022, all submissions to the Production Environment must be in the Full CAIS Phase format, no matter when the Industry Member received the data.

Additionally, after code deployment on November 6, 2022:

- All data and TID files must follow schema version 2.0.0 or higher. Any files that are received after code deployment on November 6, 2022, with a prior schema version will reject.
- All data, including repairs and corrections for rejections that originated prior to code deployment on November 6, 2022, must be reported in the Full CAIS Phase format.

CAT Reporters will have the ability to make repairs via the Reporter Portal in the Full CAIS Phase format after the Full CAIS Phase code deployment is complete (see Section 6, "Phase 2e Cutover Deployment Timeline").

5.1. Full CAIS Phase Submission and Feedback

After Full CAIS Phase code deployment to each environment:

LTID Phase (v1.0.0) submissions

- Will be validated against the LTID Phase file and record schema.
- Feedback for LTID Phase submissions will be provided in the CAIS Data Feedback file in the Full CAIS Phase (v2.0.0) format - omitting attributes that are not applicable for LTID Phase submission - e.g., *receivedNaturalRecordCount*, *successfulNaturalRecordCount*, *receivedLegalEntityRecordCount*, *successfulLegalEntityRecordCount*.
- No Identifiers Feedback nor Submission Inconsistencies Feedback files will be generated for the LTID Phase Submissions.

Full CAIS (v2.0.0) submissions

- Will be validated against the Full CAIS Phase file and record schema.
- Feedback for Full CAIS Phase submissions will be provided in the CAIS Data Feedback File, Transformed Identifiers Feedback File, and Triggered Inconsistencies Feedback File in the Full CAIS Phase (v2.0.0) format.

Any FDID Record rejections for Active Accounts must be repaired by May 24, 2024. Please see [CAT Alerts 2022-01 and 2023-01](#) for more information on the interim reporting obligations, including Interim Reporting Obligation 4. Any outstanding LTID Account Phase rejections for Active Accounts as of November 6, 2022, must be repaired in the Full CAIS Phase format. Because CAIS data is PII and cannot be returned to the CAT Reporter, data is not included in the feedback file to assist with resubmission. For this reason, CAT Reporters are encouraged to transition away from version 1.0.0 to version 2.0.0 during the Transition Period (April 24, 2022 through November 5, 2022).

5.2. Full CAIS Phase Schema Updates

The transition from LTID Account Phase to Full CAIS Phase 2e includes modifications to the current CAIS Data File, as well as the introduction of the new Transformed Identifiers File. A detailed list of schema changes between LTID Account Phase and Full CAIS Phase 2e, new record types and the TID file layout, are provided in Tables 3 and 4 below. A list of fields to be retired in the Full CAIS schema is provided in Table 5 below. Further information can be found in the [Full CAIS Industry Member Technical Specifications-Full CAIS](#).

Table 3: Schema updates for CAIS Data File

JSON Object Level	Change Description	Field Name
Main	New conditional field added	correspondentCRD
	New required field added	naturalPersonCustomerRecordCount
	New required field added	legalEntityCustomerRecordCount
	New conditional multi-dimensional added	naturalPersonCustomerList
	New conditional multi-dimensional added	legalEntityCustomerList

JSON Object Level	Change Description	Field Name
	New conditional field added	correctingCustomerRecordID
FDID Record	New required field added	accountType
	New required field added	accountName
	New conditional field added	clearingBrokerID
	New conditional field added	branchOfficeCRD
	New conditional field added	DVPCustodianID
	New conditional field added	authTraderNamesList
	New optional field added	registeredRepCRD
	New conditional field added	priorCATReporterCRD
	New conditional field added	priorCATReporterFDID
	New required multi-dimensional array added	addressList
	New conditional multi-dimensional array added	fdidCustomerList
	FDID Address List	New required field added
New required field added		addrLine1
New optional field added		addrLine2
New optional field added		addrLine3

JSON Object Level	Change Description	Field Name
	New optional field added	addrLine4
	New required field added	city
	New conditional field added	regionCode
	New required field added	countryCode
	New conditional field added	postalCode
FDID Customer Record	New required field added	role
	New required field added	customerRecordID
	New conditional field added	hasDiscretion
	New required field added	roleStartDate
	New conditional field added	roleEndDate
	New conditional field added	roleEndReason
Natural Person Customer Record	New required field added	customerRecordID
	New required field added	firstName
	New optional field added	middleName
	New required field added	lastName
	New optional field added	nameSuffix
	New conditional field added	doingBusinessAs

JSON Object Level	Change Description	Field Name
	New required field added	yearOfBirth
	New required field added	customerType
	New conditional field added	updateNotification
	New conditional multi-dimensional array added	addressList
Natural Person Address Record	New required field added	addrType
	New required field added	addrLine1
	New optional field added	addrLine2
	New optional field added	addrLine3
	New optional field added	addrLine4
	New required field added	city
	New conditional field added	regionCode
	New required field added	countryCode
	New conditional field added	postalCode
Legal Entity Customer Record	New required field added	customerRecordID
	New required field added	legalName
	New conditional field added	ein

JSON Object Level	Change Description	Field Name
	New required field added	customerType
	New conditional field added	lei
	New conditional field added	updateNotification
	New conditional multi-dimensional array added	addressList
Legal Entity Address Record	New required field added	addrType
	New required field added	addrLine1
	New optional field added	addrLine2
	New optional field added	addrLine3
	New optional field added	addrLine4
	New required field added	city
	New conditional field added	regionCode
	New required field added	countryCode
	New conditional field added	postalCode
Authorized Trader Name List	New required field added	authTraderNameID
	New required field added	authTraderName

Table 4: New Transformed Identifiers File

JSON Object Level	Change Description	Field Name
Main	New required field added	version
	New required field added	tidRecordCount
	New conditional multi-dimensional array added	tidRecordList
TID Record	New required field added	customerRecordID
	New required field added	tidType
	New conditional field added	foreignTIDType
	New conditional field added	foreignTIDCountryCd
	New required field added	tidValue
	New conditional field added	replacedByTIDType
	New conditional field added	replacingForeignTIDType
	New conditional field added	replacingForeignTIDCountryCd
	New conditional field added	replacedByTID

Table 5: Retired Fields

Event Type Code	Key
fdidEndDateNULL	Conditional
fdidEndReasonNULL	Conditional
replacedByFDIDNULL	Conditional
ltidEndDateNULL	Conditional
ltidEndReasonNULL	Conditional

6. Full CAIS Phase 2e Cutover Deployment Timeline

The Full CAIS Phase Production Go-Live date for all Industry Members is May 31, 2024. The transition from the LTID Account Phase to Full CAIS Phase 2e schema in the Production Environment will begin on November 6, 2022. FINRA CAT will communicate the completion of the code deployment via email and System Announcements. It is recommended that submissions for the November 6, 2022 CAT Processing Date should not begin until notification that the Full CAIS Phase deployment is completed.

7. Full CAIS Phase 2e Cutover Resources

- [Full CAIS Phase 2e Industry Member Technical Specifications](#)
- [Full CAIS Phase 2e Industry Member Schema](#)
- [CAT CAIS Registration & Onboarding Guide](#)
- [CAT Alert 2022-01: Full CAIS Reporting Timeline and Interim Reporting Obligations](#)
- [CAT Alert 2023-01: Interim Reporting Obligation 4 and Full CAIS Go-Live](#)